

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

SHNYAR ANWAR HASSAN

Plaintiff,

v.

Civil Action No. 1:22-cv-01288-TSE/IDD

MASROUR BARZANI

Defendant.

AFFIDAVIT REGARDING PROOF OF SERVICE

I am counsel of record in this case for Plaintiff Shnyar Anwar Hassan and hereby submit this Affidavit Regarding Proof of Service, as follows:

1. On December 16, 2022, I filed an Affidavit Requesting Foreign Mailing that asked this Court to serve a copy of the Summons and Complaint to Defendant Masrour Barzani at his office in Kurdistan, Iraq:

MASROUR BARZANI
c/o Kurdish Reginal Government
Office of the Prime Minister
Council of Ministries
4401 Erbil
Kurdistan Region, Iraq

2. I certified in my Affidavit that service of the Summons and Complaint would be made via DHL International Shipping pursuant to the provisions of Federal Rule of Civil Procedure 4(f)(2)(C)(ii), and that this method of service is not prohibited by the laws of Iraq, which is not a signatory to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents.

2. United States Magistrate Judge Ivan D. Davis thereafter entered an Order directing the Clerk's Office to mail, via DHL Express Mail, the Summons and Complaint to Defendant Masrour Barzani at the address indicated above.

3. A copy of the Summons and Complaint has been mailed, via DHL Express Mail, to the Defendant in Erbil, Iraq. I also caused those pleadings to be delivered by U.S. Postal Priority Mail to Joe R. Reeder, an attorney with the law firm Greenberg Traurig LLP in Washington, D.C., whom I understand is counsel to the Defendant in the United States. I additionally mailed the pleadings to three other locations in the United States, including McLean, Virginia, where I have reason to believe the Defendant and/or his family own real property.

3. On December 30, 2022, Mr. Reeder contacted me by email. He confirmed that he and his firm represent the Defendant and offered to accept service in exchange for my agreement to a date certain for their filing of a response to the Complaint. Mr. Reeder thereupon accepted service of the Summons and Complaint, without waiving any rights or defenses, and we agreed that the Defendant's responsive pleading is due on Tuesday, February 21, 2023.

I declare under penalty of perjury that the forgoing is true and accurate.

SECIL Law PLLC

Dated: January 14, 2023

By: /s/ John P. Rowley III
John P. Rowley III (VSB No. 19804)
Adriaen M. Morse Jr. (VSB No. 38889)
1701 Pennsylvania Ave., N.W., Suite 200
Washington, D.C. 20006
jrowley@secillaw.com
(202) 417-8652
amorse@secillaw.com
(202) 417-8232